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Before the  
FEDERAL COMMUNICATIONS COMMISSION SEP 30 2002  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
)  
Amendment of Section 73.622(b), ) MB Docket No. 02-222  
Table of Allotments, ) RM-10491  
Digital Television Broadcasting Stations. )  
(Spokane, Washington) )

To: Chief, Video Services Division

COMMENTS OF KHQ, INCORPORATED

KHQ, Incorporated ("KHQ"), licensee of KHQ-TV, Spokane, Washington, and television translator K48DX, operating on channel 48 and licensed to serve Sandpoint, Idaho, by its attorneys, files these comments in response to the Commission's Notice of Proposed Rule Making in the above-cited docket.<sup>1</sup> The NPRM proposes the substitution of DTV Channel 48 as requested by KSKN Television, Inc. ("KSKN"), permittee of KSKN-DT, currently authorized on Channel 36.

This channel substitution would result in the termination of KHQ's translator operations in Sandpoint, which provide the sole broadcast source for the Spokane television market's highly rated news, weather, sports, and local public service programming as well as the programming of the NBC Television Network to approximately 14,000 persons in Bonner County, Idaho, within the Spokane DMA.

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<sup>1</sup> DA 02-1912, Released August 9, 2002 (the "NPRM").

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meticulous engineering studies and negotiations, the caucus presented an alternative plan to the Commission,<sup>6</sup> which was given careful consideration and adopted in the Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order.<sup>7</sup> In response to the Caucus Petition, the Commission changed KSKN-DT's allocation from channel 38 to channel 36. The Commission endorsed the Caucus Petition, noting that it responded to the Commission's suggestion for voluntary coordination efforts that resulted in an agreement of all affected broadcasters.

Anyone who worked on the Caucus Petition and the underlying engineering studies can verify that the broadcasting system in the Washington-Idaho stateline area is a delicate web of complementary transmissions. A change in one element will have cascading effects on translators throughout the entire area. Accordingly, the Commission should not make changes in this environment without careful consideration of the harm that could result, especially when alternatives exist that would achieve the same objective without the accompanying loss of service inherent in KSKN's proposal.

The Caucus Petition achieved two remarkable goals, given the difficulty of coordination that was involved. It protected the network of television translators and

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<sup>6</sup> "Petition for Reconsideration Submitted by the Eastern Washington and Northern Idaho DTV Channel Allocation Caucus," filed June 13, 1997 in MM Docket No. 87-268 (the "Caucus Petition").

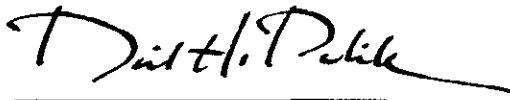
<sup>7</sup> Advanced Television Systems and Their Impact upon the Existing Television Broadcasting Service, 13 FCC Rcd 7418, ¶¶ 228-233.

it eased the Commission's channel reclamation efforts by relocating eight original DTV allocations that were outside the central core spectrum to the channel 7 through 46 range.<sup>8</sup> The KSKN proposal throws a monkey wrench into both of these important accomplishments.

**III. The Commission Should Not Change the KSKN Allocation.**

Granting the KSKN Petition would result in the loss of important broadcasting service for 14,000 people. Once the domino effects of the channel change become clear, there may be additional losses. The recent modifications made to the Moscow stations by the Idaho State Board of Education would permit KSKN to meet its expressed needs without resulting in this loss of service. Accordingly, KHQ respectfully requests that the Commission reject the KSKN Petition and terminate this proceeding.

KHQ, INCORPORATED

By: 

John C. Quale

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1440 New York Avenue, N.W.

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Its attorneys

Date: September 30, 2002

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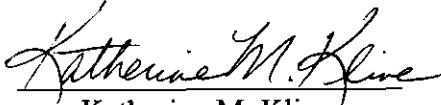
<sup>8</sup> Caucus Petition at 10.

### **CERTIFICATE OF SERVICE**

I, Katherine M. Kline, hereby certify that I have this 30th day of September, 2002, mailed by Federal Express, a copy of the "Comments of KHQ, Incorporated" to the following:

James R. Bayes  
Wiley, Rein & Fielding LLP  
1776 K Street, NW  
Washington, DC 20006

Counsel to KSKN Television, Inc.

  
Katherine M. Kline

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June 28, 2002

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JUN 28 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Marlene H. Dortch, Esquire  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-B204  
Washington, D.C. 20554

**Ref. Rm.**

62382

Re: Request for Special Temporary Authority  
KUID-TV, Moscow, Idaho

Dear Ms. Dortch:

State Board of Education, State of Idaho, which operates under the name of Idaho Public Television ("Idaho PTV"), and is permittee of noncommercial educational digital television station KUID-DT, Moscow, Idaho, hereby respectfully submits its request for Special Temporary Authority ("STA") to operate KUID-DT on the its currently assigned paired NTSC channel. A companion request for STA to operate KUID-TV on the current digital channel for KUID-DT is being submitted simultaneously herewith under separate cover.

Idaho PTV is seeking an STA to operate in accordance with the specifications set forth in the attached Engineering Statement. Essentially, Idaho PTV is seeking authority to exchange at this time the channels to be used for its NTSC and digital television ("DTV") operations. This proposed operation will result in significant cost savings to Idaho PTV and other public interest benefits as set forth below.

As the Commission is aware, television stations currently are assigned one channel for their licensed NTSC operations and a paired channel for their DTV operations. At a specified time later in the DTV transition, each licensee will specify which channel it wishes to retain as its final DTV channel, and at the end of DTV transition, the station will operate solely on that DTV channel.

KUID-TV currently operates on NTSC Channel 12, and it holds a DTV construction permit on DTV Channel 35. KUID-TV has determined, however, that its final DTV channel will be Channel 12. It is now seeking authorization to implement DTV on Channel 12 at this time

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rather than at the conclusion of the DTV transition. In order to preserve NTSC service within the KUID-TV service area, the NTSC operation would move to the currently assigned DTV channel 35. As set forth in the attached Engineering Statement, this channel exchange would not result in any new, objectionable interference.

This proposed channel exchange would serve the public interest in a number of ways. First, it would result in an enormous cost savings for Idaho PTV. Because Idaho PTV has determined that its ultimate DTV channel will be Channel 12, if it is required to begin DTV service on Channel 35, it will be forced to build its DTV facilities twice. It first would need to build a temporary facility on Channel 35, and later would need to build its final DTV facility on Channel 12. Such duplicative construction would be a waste of the scarce resources available to Idaho PTV as a noncommercial educational broadcaster.

In addition, operation of a DTV station on Channel 12 as opposed to Channel 35 will also result in tremendous cost savings for electric power. Given the higher power requirements for DTV operation, coupled with the higher power requirements for UHF operation, the difference is quite significant. The funds thus saved in the area of both construction and operation then could be used to enhance the educational programming offered by Idaho PTV and to expand its local and regional programming. The public interest would therefore directly benefit from the cost savings to be realized.

Further, the channel exchange would assist in the promotion of the DTV transition. Because the community of Moscow is located in a relatively remote area surrounded by mountains, the operation of KUID-DT on Channel 12 will provide a real-world demonstration of the signal propagation characteristics of DTV in such mountainous regions.

Additionally, the provision of new DTV service in an expeditious manner on Channel 12 will encourage viewers in the area to purchase DTV receivers in order to be able to receive the enhanced programming of KUID-DT, with its revolutionary picture and sound quality. Such encouragement is particularly important in smaller television markets such as Moscow. The purchase of more DTV receivers and converters then will encourage the provision of more DTV programming in the area, thereby advancing DTV conversion. Moreover, as more fully described in the Engineering Statement, all of these benefits will be realized without any appreciable loss in PBS service within the area.

Accordingly, taking all of these factors into account, Idaho PTV hereby respectfully requests an STA to operate KUID-DT on Channel 12 as set forth in the attached Engineering Statement. An STA is necessary because of funding constraints and weather considerations. Idaho PTV is seeking funding which will be available only if it can move forward quickly with its planned project. Moreover, prompt construction is necessary if the facilities are to be built this year. Because the station's transmitter site is located in a mountainous region, construction

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cannot go forward once the winter snows begin.

As the Commission has previously been informed in connection with other applications, neither the licensee nor any person having an attributable interest in the licensee is subject to a denial of federal benefits pursuant to the Anti-Drug Abuse Act of 1988.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,



Anne Goodwin Crump

Enclosure

cc: Mr. Keith Larson (with enclosure) **By Hand Delivery**  
Mr. John Morgan (with enclosure) **By Hand Delivery**  
Mr. James Ballis (with enclosure) **By Hand Delivery**

ENGINEERING STATEMENT  
RE REQUEST FOR SPECIAL TEMPORARY AUTHORITY  
TO OPERATE NEW DTV STATION  
KUID-DT, MOSCOW, IDAHO  
CHANNEL 12 128.5 KW ERP 339.7 METERS HAAT

JUNE 2002

COHEN, DIPPELL AND EVERIST, P.C.  
CONSULTING ENGINEERS  
RADIO AND TELEVISION  
WASHINGTON, D.C.



### Introduction

This engineering statement has been prepared on behalf of the State Board of Education, State of Idaho (the client), licensee of TV station KUID-TV, Moscow, Idaho, in support of its request for a special temporary authority (STA) for a digital television (DTV) operation. At present, KUID-TV operates on analog TV Channel 12 (204-210 MHz) with 316 kW effective radiated power (ERP) and 346 meters antenna height above average terrain (HAAT). The current analog Channel 12 operation of KUID-TV is with a non-directional TV antenna. Station KUID-DT has been allotted Channel 35 (596-602 MHz) for its digital TV operation with 805 kW maximum ERP and 346 meters HAAT. KUID-DT has been granted a construction permit (CP) (BPEDT-20000501AFW) to build DTV facilities on Channel 35 with maximum ERP of 50 kW at 299.8 meters HAAT.

The purpose of this STA request is to facilitate a swap of KUID's NTSC Channel 12 and DTV Channel 35 allotments. A paired STA request to construct and operate an NTSC facility on Channel 35 is being submitted simultaneously. Because funding deadlines are shorter than a reasonable timeline for the rule making and construction permit process, KUID-DT is requesting an STA to operate the Channel 12 DTV facility with 128.5 kW maximum ERP and 339.7 meters HAAT. The requested STA is equivalent to KUID-DT's anticipated permanent maximized DTV facilities.

### Justification

With approval to construct maximized DTV facilities on Channel 12 now rather than after the transition period, KUID will secure funding for the capital cost, accelerate the transition,

and provide the greatest coverage for a given budget. The only trade off is that for the transition, the nominal Grade B of the NTSC service on Channel 35 will be reduced compared to that of the current licensed NTSC Channel 12 operation. However, the actual reduction in transition NTSC service is extremely small because of the service area terrain and mitigating action proposed by KUID. This analysis is presented in the Channel 35 STA request.

#### Antenna Site

There is no proposed change in the antenna site. The existing Channel 12 antenna is top-mounted with the center of radiation (C/R) at 89 meters above ground level. The KUID-DT antenna is located at a multi-user site on Paradise Ridge, approximately 5 km south-southwest of Moscow, Idaho. The geographic coordinates (NAD-27) of the existing tower based on the Antenna Structure Registration No. 1041926 are as follows.

North Latitude: 46° 40' 54"

West Longitude: 116° 58' 13"

The following data shows the pertinent information concerning the proposed STA operation.

#### Antenna and Elevation Data

Antenna:	Dielectric	Model No. TW-12B12
	Beam Tilt	0.5°
	Directivity	non-directional

Elevation of the site above mean sea level	1097 meters 3599 feet
Overall height of the tower and antenna above ground including lighting protection	101.5 meters 333 feet
Overall height above mean sea level including DTV antenna	1198.5 meters 3932 feet
Height of DTV antenna radiation center above ground	89 meters 292 feet
Height of DTV antenna radiation center above mean sea level	1186 meters 3891 feet
Height of DTV antenna radiation center above average terrain	339.7 meters 1114.5 feet

#### Maximum Allowable ERP

The maximum allowable ERP for DTV operation in Zone II is 128.5 kW at 340 meters HAAT [§73.622(f)(7)]. Station KUID is proposing to operate its STA facility at this maximum power to facilitate the transition to DTV and to maximize service via NTSC translators and cable systems utilizing the DTV signal as the feed. The average elevation data of the eight cardinal radials from 3.2 to 16.1 kilometers, is based on the NGDC 3-second computerized terrain database.

#### Contour Data

Utilizing the formula in Section 73.625(b)(2) for the effective heights shown on the attached tabulation, the depression angle  $A_h$ , for each azimuth has been calculated. The maximum radiation value has been used to calculate ERP where the vertical radiation pattern at

these angles is greater than 90% of the maximum. The distances along each radial to the limits of F(50,90) 36 and 43 dBu contours were determined by referring to the propagation data for Channels 7-13, as published by the Commission in Figures 10 and 10a, Section 73.699 of its rules. The distances along the eight cardinal radials to the predicted F(50,90) 36 and 43dBu contours, the average elevations, and the effective antenna heights are included on the attached tabulation (Table I).

Station KUID-DT places a predicted 43 dBu contour over the community of license. The attached Map 1 shows the computed F(50,90) 36 dBu (noise limited) and 43 dBu (community coverage) contours predicted according to Section 73.625(b) of the Commission's rules based on the DTV facilities of 128.5 kW ERP and 339.7 meters HAAT.

#### Spacing and Interference Analysis

The proposed DTV Channel 12 operation is fully spaced to all stations as per Section 73.623(d)(2) of the FCC Rules. The proposal is compliant with the interference requirement of Section 73.623(c) of the rules. The stations to be considered according to the processing guidelines and predicted interference are summarized in Table II.

#### International Coordination

The KUID-DT site is 294 km (183 miles) from the Canadian border and is therefore within the coordination distance of 400 km (249 miles). The requested DTV STA ERP of 128.5 kW for Channel 12 is 3.9 dB below the current licensed NTSC Channel 12 ERP of 316 kW.

There are no Channel 12 regular power Canadian stations or allotments, as listed in Appendix 1B of the Letter of Understanding, within 283 km of the KUID site. 283 km is the maximum co-channel separation requirement for DTV-to-DTV or DTV-to-NTSC considering all station classes. The distance of the KUID site from the Canadian border exceeds all first-adjacent channel separation requirements. Therefore, the requested STA complies with all requirements of the Letter of Understanding.

#### Environmental Statement

Since the existing Channel 12 NTSC antenna and tower will be utilized, it is believed the environmental concerns listed in Section 1.1307(a) of the Commission's rules are not pertinent; therefore, those issues have not been addressed.

An evaluation has been made to determine compliance with the Commission's specified standards for human exposure to RF fields as set forth in the OET Bulletin No. 65 dated August 1997. For a maximum effective radiated power of 128.5 kW and a radiation center of 89 meters above ground level, the proposed STA operation would have a maximum of 1.5 microwatts per square centimeter ( $\mu\text{W}/\text{cm}^2$ ) RF field at 2 meters above ground in the vicinity of the tower, utilizing the manufacturer's antenna field factor of 0.05 in the downward direction. The Commission's guidelines for Channel 12 DTV operation are  $1000 \mu\text{W}/\text{cm}^2$  for the occupational/controlled Maximum Permissible Exposure (MPE) and  $200 \mu\text{W}/\text{cm}^2$  for the general population/uncontrolled MPE.

KUID-TV's proposed analog TV Channel 35 operation will also be located on the same tower. KFRA-FM operates from the same tower as KUID and KZLL-FM operates from a tower

approximately 150 meters away. A combined worst-case RF field level at the site has been estimated presuming that the maximum downward radiation combines at a single point. The attached Table II lists the RF field contribution of each station. Table III shows that the combined value would be less than the Commission's MPE guidelines.

Another FM station, KZFN(FM), transmits from a tower approximately 270 meters away from the KUID tower. Although it does not contribute significantly to the RF levels near the base of the KUID tower, the access road leading to the KUID tower does pass within approximately 40 meters of the KZFN tower. An estimated RFF for KZFN at the access road, utilizing CDBS data and the above procedure, yields a value greater than the general population MPE. However, the client has made measurements on the access road near KZFN which show the actual RFF is no more than 12.5% of the MPE. Measurements will be repeated after construction of the STA facilities. Therefore, members of the public and personnel working near the proposed KUID-DT Channel 12 STA facility would not be exposed to RF fields exceeding the Commission's guidelines. With respect to work performed on the tower, station KUID will establish written procedures to ensure that workers are not exposed to RF fields above the Commission's guidelines, by reducing or turning off the power, as appropriate.

For the reasons stated above, it is believed this proposal complies with Section 1.1307(a) and (b) of the Commission's Rules; therefore, under Section 1.1306, it is categorically excluded from the environmental processing.

TABLE I  
COMPUTED COVERAGE DATA  
FOR THE PROPOSED DTV OPERATION AT  
MOSCOW, IDAHO  
JUNE 2002

<u>Radial</u> N ° E,T	<u>Average*</u> <u>Elevation</u> <u>3.2 to 16.1 km</u>	<u>Effective</u> <u>Height</u> meters	<u>Depression</u> <u>Angle</u> degrees	<u>ERP at</u> <u>Radio</u> <u>Horizon</u> kW	<u>Distance to Contour F(50.90)</u>	
	meters				<u>48 dBu</u> <u>City Grade</u> km	<u>41 dBu</u> <u>Noise-Limited</u> km
0	841.4	344.6	0.514	128.5	94.0	107.1
45	889.4	296.6	0.477	128.5	90.5	103.2
90	832.5	353.5	0.521	128.5	94.7	107.8
135	855.7	330.3	0.503	128.5	92.9	106.0
180	880.7	305.3	0.484	128.5	91.1	103.9
225	869.9	316.1	0.492	128.5	91.8	104.8
270	798.5	387.5	0.545	128.5	97.1	110.5
315	800.2	385.8	0.544	128.5	97.0	110.4
Average	846.0	340.0		128.5		

\*Based on data from FCC 3-second data base.

DTV Channel 12 (204-210 MHz)  
Average Elevation 3.2 to 16.1 km 846 meters AMSL  
Center of Radiation 1186 meters AMSL  
Antenna Height Above Average Terrain 340 meters  
Effective Radiated Power 128.5 kW (21.09 dBk) Max.

(NAD-27)

North Latitude: 46° 40' 54"  
West Longitude: 116° 58' 13"

TABLE II  
LONGLEY-RICE INTERFERENCE [73.623(c)] STUDY  
FOR THE PROPOSED  
KUID-DT, CHANNEL 12, MOSCOW, IDAHO  
124 KW, 346 METERS HAAT  
JUNE 2002

<u>Station</u>	<u>Distance/Bearing Spacing</u>	<u>Coordinates NAD-27</u>	<u>Predicted New Interference</u>
KFFX-TV, Ch. 11 Spokane, WA Lic. 316 kW DA 472 M	138 km/356° fully-spaced	45° 44' 51" 118° 02' 11"	0.0%
KUID-TV, Ch. 12 Moscow, ID Lic. 316 kW 346 M	0 km/0° same site	46° 40' 54" 116° 58' 13"	proposed change to NTSC Ch. 35
KTRV(TV), Ch. 12 Nampa, ID Lic. 178 kW 829 M	332 km/168° fully-spaced	43° 45' 18" 116° 05' 52"	0.0%
KTVH(TV), Ch. 12 Helena, MT Lic. 180 kW 711 M	402 km/86° fully-spaced	46° 49' 35" 111° 42' 33"	0.0%
KTVH(TV), Ch. 12 Helena, MT App. 217 kW 711 M	402 km/86° fully-spaced	46° 49' 35" 111° 42' 33"	0.0%
KXLY-DT, Ch. 13 Spokane, WA Allot. 27.3 kW DA 933 M	138 km/356° fully-spaced	47° 55' 18" 117° 06' 48"	0.0%
KXLY-DT, Ch. 13 Spokane, WA Lic. 23.3 kW 936 M	138 km/356° fully-spaced	47° 55' 18" 117° 06' 48"	0.0%
KTVR(TV), Ch. 13 La Grande, OR Lic. 7.2 kW 787 M	163 km/201° fully-spaced	45° 18' 35" 117° 43' 57"	0.0%
KTVR-TV, Ch. 13 La Grande, OR CP 100 kW 780 M	163 km/201° fully-spaced	45° 18' 35" 117° 43' 57"	0.0%

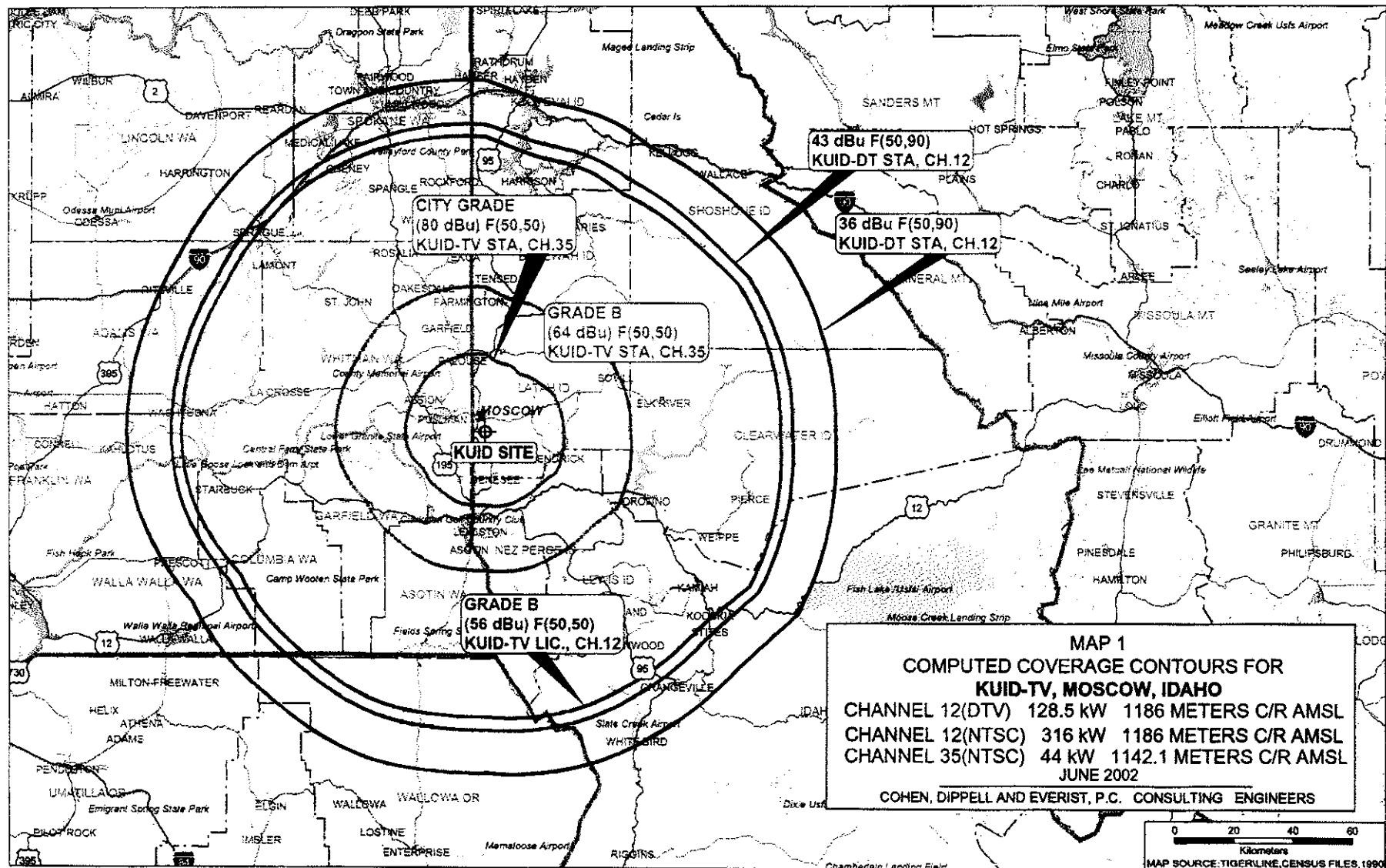
No contour overlap to any Class A stations.

Source: CDBS 2/25/02



**TABLE III**  
**RFF CONTRIBUTIONS BY**  
**THE PROPOSED KUID-DT STA**  
**AND NEARBY STATIONS**  
**JUNE 2002**

<u>Station</u>	Center of Radiation <u>Above Ground</u> Meters	RFF @ 2 M <u>Above Ground</u> $\mu\text{W}/\text{cm}^2$	<u>MPE Guideline</u>	
			<u>Controlled</u> $\mu\text{W}/\text{cm}^2$	<u>Uncontrolled</u> $\mu\text{W}/\text{cm}^2$
	[Relative Field Towards Ground]		[% Contribution]	[% Contribution]
<b>KUID-DT, Ch. 12</b> 128.5 kW	89 M [0.05]	1.4	1000 [0.2%]	200 [0.5%]
<b>KUID-TV, Ch. 35</b> 44 kW	45.1 M [0.13]	6.7	1986 [0.3%]	397 [1.7%]
<b>KRFA-FM, Ch. 219C1</b> V: 14.5 kW, H: 0 kW 4-bay	31 M [0.35]	70.5	1000 [7.1%]	200 [35.3%]
<b>150 M from KUID:</b> <b>KZZL-FM, Ch. 258C1</b> V: 77 kW, H: 77 kW 10-bay	72 M [0.22]	50.8	1000 [5.8%]	200 [25.4%]
<b>Separate Site near Access Road (270 M from KUID)</b>				
<b>KZFN(FM), Ch. 291C1</b> V: 62 kW, H: 62 kW 6-bay	22 M [0.30]	932	1000 [93.2%]	200 [466%]
<b>Measured Value on Access Road</b>		25	1000 [2.5%]	200 [12.5%]



## SECTION VII- DTV Engineering

**Complete Questions 1-5 of the Certification Checklist and provide all data and information for the proposed facility, as requested in Technical Specifications, Items 1-13.**

**Certification Checklist:** A correct answer of "Yes" to all of the questions below will ensure an expeditious grant of a construction permit. However, if the proposed facility is located within the Canadian or Mexican borders, coordination of the proposal under the appropriate treaties may be required prior to grant of the application. An answer of "No" will require additional evaluation of the applicable information in this form before a construction permit can be granted.

1. The proposed DTV facility complies with 47 C.F.R. Section 73.622 in the following respects:

- (a) It will operate on the DTV channel for this station as established in 47 C.F.R. Section 73.622. ☐ Yes ☒ No
- (b) It will operate from a transmitting antenna located within 5.0 km (3.1 miles) of the DTV reference site for this station as established in 47 C.F.R. Section 73.622. ☒ Yes ☐ No
- (c) It will operate with an effective radiated power (ERP) and antenna height above average terrain (HAAT) that do not exceed the DTV reference ERP and HAAT for this station as established in 47 C.F.R. Section 73.622. ☒ Yes ☐ No

2. The proposed facility will not have a significant environmental impact, including exposure of workers or the general public to levels of RF radiation exceeding the applicable health and safety guidelines, and therefore will not come within 47 C.F.R. Section 1.1307. ☒ Yes ☐ No

Applicant must submit the Exhibit called for in Item 13.

3. Pursuant to 47 C.F.R. Section 73.625, the DTV coverage contour of the proposed facility will encompass the allotted principal community. ☒ Yes ☐ No
4. The requirements of 47 C.F.R. Section 73.1030 regarding notification to radio astronomy installations, radio receiving installations and FCC monitoring stations have either been satisfied or are not applicable. ☒ Yes ☐ No
5. The antenna structure to be used by this facility has been registered by the Commission and will not require reregistration to support the proposed antenna, OR the FAA has previously determined that the proposed structure will not adversely effect safety in air navigation and this structure qualifies for later registration under the Commission's phased registration plan, OR the proposed installation on this structure does not require notification to the FAA pursuant to 47 C.F.R. Section 17.7. ☒ Yes ☐ No

## SECTION VII - DTV Engineering

## TECHNICAL SPECIFICATIONS

Ensure that the specifications below are accurate. Contradicting data found elsewhere in this application will be disregarded. All items must be completed. The response "on file" is not acceptable.

## TECH BOX

1. Channel Number: DTV 12 Analog TV, if any 35
2. Zone: ☐ I ☒ II ☐ III
3. Antenna Location Coordinates: (NAD 27)
- |              |             |             |                                       |   |
|--------------|-------------|-------------|---------------------------------------|---|
| <u>46</u> °  | <u>40</u> ' | <u>54</u> " | <input checked="" type="checkbox"/> N | <input type="checkbox"/> S Latitude             |
| <u>116</u> ° | <u>58</u> ' | <u>13</u> " | <input type="checkbox"/> E            | <input checked="" type="checkbox"/> W Longitude |
4. Antenna Structure Registration Number: 1041926
- ☐ Not applicable ☐ FAA Notification Filed with FAA
5. Antenna Location Site Elevation Above Mean Sea Level: 1097.0 meters
6. Overall Tower Height Above Ground Level: 101.5 meters
7. Height of Radiation Center Above Ground Level: 89.0 meters
8. Height of Radiation Center Above Average Terrain: 339.7 meters
9. Maximum Effective Radiated Power (average power): 128.5 kW
10. Antenna Specifications:
- |    |              |            |       |          |
|----|--------------|------------|-------|----------|
| a. | Manufacturer | Dielectric | Model | TW-12A12 |
|----|--------------|------------|-------|----------|
- b. Electrical Beam Tilt: 0.5 degrees ☐ Not Applicable
- c. Mechanical Beam Tilt: \_\_\_\_\_ degrees toward azimuth \_\_\_\_\_ degrees True ☒ Not Applicable
- Attach as an Exhibit all data specified in 47 C.F.R. Section 73.625(c). Exhibit No.
- d. Polarization: ☒ Horizontal ☐ Circular ☐ Elliptical

## TECH BOX

e. Directional Antenna Relative Field Values: ☒ Not applicable (Nondirectional)Rotation: \_\_\_\_\_ ° ☐ No rotation

Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value	Degree	Value
0		60		120		180		240		300	
10		70		130		190		250		310	
20		80		140		200		260		320	
30		90		150		210		270		330	
40		100		160		220		280		340	
50		110		170		230		290		350	
Additional Azimuths											

If a directional antenna is proposed, the requirements of 47 C.F.R. Section 73.625(c) must be satisfied. **Exhibit required.**

Exhibit No.

11. Does the proposed facility satisfy the interference protection provisions of 47 C.F.R. Section 73.623(a)? (Applicable only if **Certification Checklist** Items 1(a), (b), or (c) are answered "No.") ☒ Yes ☐ No

If "No," attach as an Exhibit justification therefor, including a summary of any related previously granted waivers.

Exhibit No.

12. If the proposed facility will not satisfy the coverage requirement of 47 C.F.R. Section 73.625, attach as an Exhibit justification therefor. (Applicable only if **Certification Checklist** Item 3 is answered "No.")

Exhibit No.

13. **Environmental Protection Act.** Submit in an Exhibit the following:

Exhibit No.

- a. If **Certification Checklist** Item 2 is answered "Yes," a brief explanation of why an Environmental Assessment is not required. Also describe in the Exhibit the steps that will be taken to limit RF radiation exposure to the public and to persons authorized access to the tower site.

By checking "Yes" to **Certification Checklist** Item 2, the applicant also certifies that it, in coordination with other users of the site, will reduce power or cease operation as necessary to protect persons having access to the site, tower or antenna from radiofrequency electromagnetic exposure in excess of FCC guidelines.

If **Certification Checklist** Item 2 is answered "No," an Environmental Assessment as required by 47 C.F.R. Section 1.1311.

**PREPARER'S CERTIFICATION ON PAGE 8 MUST BE COMPLETED AND SIGNED.**



Federal Communications Commission  
Washington, D.C. 20554

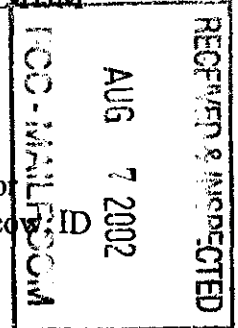
AUG - 9 2002

REFERENCE ROOM

State Board of Education  
State of Idaho  
1455 North Orchard  
Boise, ID 83706

1800E-HIM

In re: Special Temporary Authorizations for  
Stations KUID and KUID-DT, Moscow, ID  
(BSTA-20020628ACQ & BDSTA-  
20020628ACH)  
Facility ID: 62382



Gentlemen:

This refers to the above-captioned requests for Special Temporary Authorizations (STAs) for non commercial educational television station KUID, Moscow, ID to commence digital broadcasting on its assigned analog channel (Channel 12) and to continue its analog broadcasts on its assigned Digital Channel (Channel 35).

While KUID is seeking to rapidly implement Digital TV service to viewers through this STA, it has also filed a Petition for Rulemaking to make permanent the changes which are requested here on a temporary basis. In addition, grant of this authorization allows KUID to receive timely state and federal funding to speed Idaho's transition to Digital TV.

After a thorough review of the technical submissions, we are persuaded that no interference is likely to occur from the proposed operation. If problems do arise, including any complaints relating to the loss of analog service from viewers, we require that they be resolved expeditiously. Further, we reserve the right to terminate this operation without notice. In addition, this grant is conditioned on KUID's maintenance of its present technical facilities. It has stated that it would do so. We therefore conclude that the public interest would be served by the grant of this request.

With respect to radio frequency radiation (RFR), we expect compliance with Section 1.1307(b) of the Commission's Rules to be achieved by both facilities.

Accordingly, the requests for special temporary authorizations to broadcast DTV signals on Channel 12 for KUID-DT, and analog signals on Channel 35 for KUID-TV in Moscow, Idaho, ARE GRANTED subject to the following conditions:

1. The grant of these STAs is subject to the condition that, with ample time before commencing operation, you make a good faith effort to identify and notify health care facilities (e.g., hospitals, nursing homes, see 47 CFR 15.242(a)(1) within your service areas potentially

affected by both operations. Contact with state and/or local hospital associations and local government health care licensing authorities may prove helpful in this process. During this pre-broadcast periods, you must provide all notified entities with relevant technical details of your operation, such as channels, targeted on-air date, effective radiated powers, antenna location, and antenna heights. You are required to place in the station's public inspection file documentation of the notifications and contacts made and you may not commence operations until good faith efforts have been made to notify affected health care facilities. During this pre-broadcast period and for up to twenty (20) days after commencing operations, should you become aware of any instances of medical devices malfunctioning or that such devices are likely to malfunction due to your operations, you must cooperate with the health care facility so that it is afforded a reasonable opportunity to resolve the interference problem. At such time as all provisions of this condition have been fulfilled, and either upon the expiration of twenty (20) days following commencement of operations or when all known interference problems have been resolved, whichever is later, this condition lapses.

2. This authorization expires six months from date of this letter. An extension application must be filed in a timely manner to continue these operations.

3. ANALOG TERMS AND CONDITIONS

Channel: 35

Antenna Coordinates: N. Latitude: 46-40-54  
W. Longitude: 116-58-13

Tower Registration Number: 1041926

Antenna Type: NON-DIRECTIONAL, AND/ALP24M3-HSOC-35

Maximum Effective Radiated Power: 44 kW

Transmitter: Type Accepted. See Section 73.1660, 73.1665 and 73.1670 of the FCC Rules

Height of radiation center above ground: 45.1 meters

Height of radiation center above mean sea level: 1142.1 meters

Height of radiation center above average terrain: 291

4. DIGITAL TERMS AND CONDITIONS

Channel: 12

Antenna Coordinates: N. Latitude: 46-40-54

W. Longitude: 116-58-13

Tower Registration Number: 1041926

Antenna Type: NON-DIRECTIONAL, DIE/TW-12B12

Maximum Effective Radiated Power (average): 128.5 kW

Transmitter: Type Accepted. See Section 73.1660, 73.1665 and 73.1670 of the FCC Rules

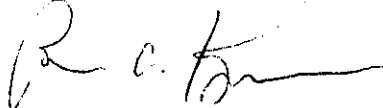
Height of radiation center above ground: 89 meters

Height of radiation center above mean sea level: 1186 meters

Height of radiation center above average terrain: 339.7

5. KUID shall retain the necessary technical equipment on site and maintain it in such a manner as to permit a rapid return to its originally assigned DTV and NTSC channels.

Sincerely



Barbara A. Kreisman  
Chief, Video Division  
Media Bureau

cc: Anne Godwin Crump, Esq.  
Donald Everist